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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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|--------------------------|---|--------------------------|
| UNITED STATES OF AMERICA | : | Hon. |
| | : | |
| v. | : | Criminal No. 20- 39 (ES) |
| | : | |
| RAUL ORLANDO TORRES | : | |
| CUBIDES, | : | 21 U.S.C. § 963 |
| a/k/a "Jose Jota," | : | 21 U.S.C. § 846 |
| a/k/a "Jose J.," | : | 18 U.S.C. § 1956(h) |
| a/k/a "El Don," | : | |
| a/k/a "El Viejo" | : | |

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark,
charges:

COUNT ONE

(Conspiracy To Import Controlled Substances)

From in or around 2016 through on or about January 10, 2020, in
Colombia, Venezuela, the Dominican Republic, and elsewhere, the defendant,

RAUL ORLANDO TORRES CUBIDES,
a/k/a "Jose Jota,"
a/k/a "Jose J.,"
a/k/a "El Don,"
a/k/a "El Viejo,"

did knowingly and intentionally conspire and agree with others to import into
the customs territory of the United States from places outside thereof, to
include Venezuela, Colombia, and the Dominican Republic, a controlled
substance in Schedule II, namely, five kilograms or more of a mixture and

substance containing a detectable amount of cocaine, contrary to Title 21, United States Code, Sections 952 and 960(b)(1)(B)(ii).

In violation of Title 21, United States Code, Section 963.

COUNT TWO

(Conspiracy To Distribute a Controlled Substance for Unlawful Importation)

From in or around 2016 through on or about January 10, 2020, in
Colombia, Venezuela, the Dominican Republic, and elsewhere, the defendant,

RAUL ORLANDO TORRES CUBIDES,

a/k/a “Jose Jota,”

a/k/a “Jose J.,”

a/k/a “El Don,”

a/k/a “El Viejo,”

did knowingly and intentionally conspire and agree with others to distribute a controlled substance in Schedule II, namely, five kilograms or more of a mixture and substance containing a detectable amount of cocaine, intending, knowing, and having reasonable cause to believe that such controlled substance would be unlawfully imported into the United States, contrary to Title 21, United States Code, Sections 959, 960(a)(3), and 960(b)(1)(B)(ii).

In violation of Title 21, United States Code, Section 963.

COUNT THREE
(Conspiracy To Distribute Cocaine)

From in or around 2016 through on or about January 10, 2020, in
Colombia, Venezuela, the Dominican Republic, and elsewhere, the defendant,

RAUL ORLANDO TORRES CUBIDES,
a/k/a “Jose Jota,”
a/k/a “Jose J.,”
a/k/a “El Don,”
a/k/a “El Viejo,”

did knowingly and intentionally conspire and agree with others to distribute and possess with intent to distribute five kilograms or more of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, contrary to Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

In violation of Title 21, United States Code, Section 846.

COUNT FOUR

(Conspiracy to Commit Money Laundering)

From in or around 2016 through on or about January 10, 2020, in the District of New Jersey, and elsewhere, the defendant,

RAUL ORLANDO TORRES CUBIDES,

a/k/a “Jose Jota,”

a/k/a “Jose J.,”

a/k/a “El Don,”

a/k/a “El Viejo,”

knowing that the monetary instrument and funds involved in the transportation, transmission, or transfer represented the proceeds of some form of specified unlawful activity, namely, narcotics distribution, and with the intent to promote the carrying on of the narcotics distribution and to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the narcotics distribution, did knowingly and intentionally conspire and agree with others to transport, transmit, and transfer a monetary instrument or funds from a place in the United States to or through a place outside the United States, contrary to Title 18, United States Code, Sections 1956(a)(2)(A) and 1956(a)(2)(B)(i).

In violation of Title 18, United States Code, Section 1956(h).

FORFEITURE ALLEGATIONS AS TO COUNTS ONE THROUGH THREE

1. As a result of committing the controlled substance offenses in violation of As a result of committing the controlled substance offenses in violation of 21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(A), 963, 952, 959, 960(a)(1), 960(a)(3), and 960(b)(1)(B)(ii), as charged in Counts One through Three of this Indictment, the defendant,

RAUL ORLANDO TORRES CUBIDES,

a/k/a “Jose Jota,”

a/k/a “Jose J.,”

a/k/a “El Don,”

a/k/a “El Viejo,”

shall forfeit to the United States of America, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the said offenses, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged in Counts One through Three of this Indictment.

FORFEITURE ALLEGATIONS AS TO COUNT FOUR

1. As the result of committing the money laundering conspiracy offense in violation of 18 U.S.C. § 1956(h) alleged in Count Four of the Indictment, the defendant,

RAUL ORLANDO TORRES CUBIDES,

a/k/a “Jose Jota,”

a/k/a “Jose J.,”

a/k/a “El Don,”

a/k/a “El Viejo,”

shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, involved in the money laundering conspiracy offense, and all property traceable to such property.

FORFEITURE ALLEGATIONS AS TO ALL COUNTS

Substitute Assets Provision

2. With respect to Counts One through Four of the Indictment, if any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b), to forfeiture of any other property of the defendants up to the value of the above-described forfeitable property.

A TRUE BILL,

FORWARDED



CRAIG CARPENITO
United States Attorney

CASE NUMBER: 20- 39- B5

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

RAUL ORLANDO TORRES CUBIDES,

a/k/a "Jose Jota";

a/k/a "Jose J.";

a/k/a "El Don";

a/k/a "El Viejo"

INDICTMENT FOR

21 U.S.C. § 963

21 U.S.C. § 846

18 U.S.C. § 1956(h)



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